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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

Wireless Telecommunications Bureau )  
 Seeks Comment on New Implementation )  
 Deadline for TTY Access to Digital )  
 Wireless Systems for 911 Calls )

CC Docket No. 94-102

To: Chief, Wireless Telecommunications Bureau

**REPLY COMMENTS OF NEXTEL COMMUNICATIONS, INC.**

**I. INTRODUCTION**

Pursuant to the May 17, 2000 Public Notice of the Federal Communications Commission ("Commission"),<sup>1</sup> Nextel Communications, Inc. ("Nextel") respectfully submits these Reply Comments on whether December 31, 2001 is "a reasonable deadline for implementation of a digital wireless [text telephone] solution. . ."<sup>2</sup>

Based on Nextel's own knowledge and experience in working on a text telephone ("TTY") capability for its iDEN system and handsets, as well as the Comments submitted herein, Nextel respectfully submits that December 31, 2001 is not a reasonable deadline for implementing a TTY solution on any digital mobile communications system. The Comments

<sup>1</sup> Public Notice, "Wireless Telecommunications Bureau Seeks Comment on New Implementation Deadline for TTY Access To Digital Wireless Systems for 911 Calls," DA 00-1091, released May 17, 2000 ("Public Notice").

<sup>2</sup> *Id.* at p. 3.

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demonstrate that the Commission's attempt to establish a deadline is premature, given the state of technology development.<sup>3</sup> Therefore, Nextel respectfully requests that the Commission postpone establishing a TTY implementation date until equipment vendors have developed more information and completed additional testing of TTY capabilities on all digital mobile communications technologies. Once solutions are developed, carriers should be held accountable for implementing them on their wireless networks.

In the Public Notice, the Commission references the development of the Lucent TTY solution as the potential avenue for resolving TTY access on digital networks. The existence of the Lucent TTY solution, however, does not end the research and development stage of TTY accessibility on digital wireless systems.<sup>4</sup> For many handset manufacturers, network vendors and wireless carriers, using technologies different from those for which the Lucent solution was created, there is significant work left to be done.<sup>5</sup> Because the TTY solutions have not been developed, it is premature to impose on carriers a deadline for implementing the yet-to-be-developed capabilities into their networks.

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<sup>3</sup> Comments of Rural Cellular Association at p. 1; Bellsouth Corp. ("Bellsouth") at p. 1; Nokia, Inc. at pp. 2-3; AT&T Wireless Services ("AWS") at p. 1.

<sup>4</sup> The Lucent solution was developed for digital mobile networks using CDMA and TDMA technologies. It is not readily adaptable to other digital platforms, *e.g.*, iDEN, GSM, without modifications to critical system components and software.

<sup>5</sup> *See, e.g.*, Comments of Sprint PCS at pp. 4-8; Bellsouth at pp. 4-7; Ericsson, Inc. ("Ericsson") at pp. 2-5; Motorola.

Only SBC Wireless ("SBC") stated that it may be capable of meeting the proposed December 31, 2001 deadline. SBC's position, however, is based on predictions that even SBC recognizes require successful testing of the technology and no slippage on any of the implementation and delivery time frames.<sup>6</sup> While, under optimum circumstances, SBC might be prepared to implement a TTY solution on its wireless system by December 31, 2001, Nextel submits that most technology deployment schedules do not occur without temporary setbacks. Even if the deployment was accomplished without any delays or setbacks, the TTY solutions to be used by SBC are not usable by every other technology platform. Thus, the Commission should carefully weigh SBC's comments in the context of the overall comments submitted in this proceeding.

Each carrier and manufacturer submitting comments herein specifically outlined the numerous tasks yet to be completed for development, testing and implementation of TTY capabilities on digital wireless systems.<sup>7</sup> Until these tasks are accomplished, *e.g.*, development, validation, verification, testing and acceptance,<sup>8</sup> carriers cannot even begin the process of rolling out the TTY functionality on their systems.<sup>9</sup> Carriers, moreover, consistently

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<sup>6</sup> Comments of SBC at p. 4.

<sup>7</sup> See, *e.g.*, Comments of Nextel; Motorola; Sprint PCS.

<sup>8</sup> Comments of Ericsson at pp. 3-4.

<sup>9</sup> *Id.*

stated in their Comments that rolling out the TTY capability will require at least 12 months.<sup>10</sup> This twelve-to-fifteen month time period is particularly critical for carriers, like Nextel and others, with nationwide systems.<sup>11</sup>

Therefore, Nextel respectfully submits that December 31, 2001 is not a reasonable date by which digital wireless carriers can implement TTY functionality on their systems, and the Commission should not impose this deadline. The Commission should not impose any deadline at this time and should not require onerous reporting requirements that will only increase carriers' administrative costs and burdens without supporting TTY implementation. Rather, the Commission should continue to monitor the progress of TTY implementation – as it has done successfully thus far – through the Wireless TTY Forum. Once carriers and manufacturers have

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<sup>10</sup> Comments of Nextel; Sprint PCS at pp. 4-8; Bellsouth at p. 8; AWS at p. 4. This 12-to-15-month implementation timeframe is consistent with Bellsouth's proposal that would require a one-year carrier deployment schedule.

<sup>11</sup> Comments of Sprint PCS at pp. 6-7.

more closely researched the application of the Lucent solution to their systems and tested its usefulness thereon, the Commission should revisit a proposed TTY implementation deadline.

Respectfully submitted,

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